



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

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Brooklyn, New York 11201*

June 5, 2024

By ECF

Honorable LaShann DeArcy Hall
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States of America v. Jonathan Goulbourne,*
No. 22-cr-106 (LDH)

Dear Judge DeArcy Hall:

This letter is respectfully submitted on behalf of the Metropolitan Detention Center in accordance with Your Honor's Order dated June 4, 2024, directing the filing of a status letter concerning the engagement of independent counsel for the five witnesses whom the Court has directed to appear at the evidentiary hearing.

Representation of the witnesses in accordance with 28 C.F.R. §§ 50.15–50.16 in the form of private counsel at Department of Justice expense with respect to the matters that are the subject of the Court's show cause order was approved on May 22, 2024. Thereafter, the Department notified the Federal Bureau of Prisons that private counsel at the Department's expense had been authorized, and provided a list of private attorneys for the individual witnesses to consider.

As reported in the status letter dated May 29, 2024, we were informed of the retention of private counsel by two of the individuals:

Assistant Health Services Administrator Blake Glucksnis, BA, NRP, has retained Nicholas Kaizer, Levitt & Kaizer.

Staff Attorney Elizabeth Lynch has retained Christopher B. Harwood, Morvillo Abramowitz Grand Iason & Anello PC.

Since the filing of the May 29, 2023 status letter, we have been informed of the following:

Clinical Director Bruce Bialor, M.D. has retained Heidi A. Wendel, The Law Office of Heidi A. Wendel, PLLC.

Marilyn Garcia, R.N. has retained Elizabeth Wolstein, Schlam Stone & Dolan LLP.

Lieutenant Stedman Ferguson – the retainer agreement with private counsel is pending.

Thank you for Your Honor’s consideration of this submission.

Respectfully submitted,

BREON PEACE
UNITED STATES ATTORNEY

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